UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Bankr. No. 19-23468 GLT
SHANDA K. WELSH,	)
	) Chapter 13
Debtor.	)
	) Docket No. 44
PINGORA LOAN SERVICING,	) Related to Docket No.
	)
Movant,	) Hearing Date & Time:
	)
vs.	) Claim No. 12
	)
SHANDA K. WELSH AND	)
RONDA J. WINNECOUR,	)
CHAPTER 13 TRUSTEE,	)
	)
Respondents.	)

DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtor, Shanda k. Welsh, by and through her attorney, who respectfully represents the following:

1. On or about August 31, 2019, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.

2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.

3. Pingora Loan Servicing filed a Notice of Mortgage Payment Change. The monthly mortgage payment of **$1,417.79** has been **increased** to **$1,429.52** effective **1/1/2021**

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment according to the above referenced Notice of Mortgage Payment Change commencing with the next distribution in the effective amount.

Respectfully submitted.

Date:11/23/2020   /s/ Rodney D. Shepherd
                        Rodney D. Shepherd, Esquire
                        Attorney for the Debtor
                        PA I.D. No. 56914
                        2403 Sidney Street, Suite 208
                        Pittsburgh, PA 15203
                        (412) 471-9670
                        rodsheph@cs.com

CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 23rd day of November, 2020, by Electronic Filing and U.S. Mail, first class, upon the following:

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
cmecf@chapter13trusteewdpa.com

Pingora Loan Servicing
Attn: Brian C. Nicholas, Esquire
KML Law Group
701 Market Street, Suite 5000
Philadelphia, PA 19106
bnicholas@kmllawgroup.com

By: /s/ Rodney D. Shepherd
    Rodney D. Shepherd
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